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7 *FocalPoint International, Inc.*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 FOCALPOINT INTERNATIONAL, INC.,

14 Case No.: 2:18-cv-00236-APG-PAL

15 Plaintiff,

16 vs.

17 **STIPULATION AND ORDER TO EXTEND**
18 **DISCOVERY DEADLINES**

19 DOM RUBINO CONSULTING SERVICES,
19 INC.; and BIZSTRATPLAN, INC.,

20 **[FIRST REQUEST]**

21 Defendants.

22 Plaintiff, FocalPoint International, Inc. (“FocalPoint”), and Defendants Dom Rubino
23 Consulting Services, Inc. (“DRCS”) and BizStratPlan Inc. (“BizStratPlan”) (collectively, the
24 “Parties”), by and through their respective counsel of record, and pursuant to Local Rules 7-1 and
25 26-4, hereby stipulate and agree to extend the deadlines contained in the Discovery Plan and
Scheduling Order [Doc. 27] for a period of 60 days for the reasons set forth herein.

26 **I. DISCOVERY COMPLETED TO DATE**

27 The Parties have each submitted their initial disclosures. On April 20, 2018, Defendants
28 served their Initial Disclosures Pursuant to FRCP 26(a)(1). On May 24, 2018, FocalPoint Served its

1 Initial Disclosures Pursuant to FRCP 26(a)(1). On June 22, 2018, FocalPoint served its First
 2 Supplemental Disclosures. On July 2, 2018, FocalPoint served its Second and Third Supplemental
 3 Disclosures.

4 The Parties have also served written discovery. On June 1, 2018, Defendants served
 5 Requests for Production on FocalPoint. FocalPoint provided its initial response to these Requests on
 6 July 2, 2018. Efforts to complete its response remain ongoing. On June 22, 2018, FocalPoint served
 7 its First Set of Interrogatories and First Set of Document Requests on both DRCS and BizStratPlan.
 8 Defendants' efforts to respond to these discovery requests remain ongoing.

9 **II. REASONS FOR EXTENDING DEADLINES; GOOD CAUSE**

10 The Parties have made reasonable efforts in good faith to respond to the respective
 11 discovery requests and resolve the case. However, given some unforeseen circumstances, including
 12 the Parties' ongoing settlement discussions and the recent addition of a third-party, the Parties have
 13 determined that they need a limited extension to allow for full development of the record. The
 14 Parties' joint request to extend the deadlines in this matter is made in good faith and good cause
 15 exists for such an extension. This request is not made for purposes of delay.

16 **III. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY**

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Discovery cutoff	September 18, 2018	November 19, 2018
Deadline to amend pleadings	June 20, 2018	August 20, 2018
Deadline for Interim Status Report	July 20, 2018	September 21, 2018
Deadline to make initial expert disclosures	July 20, 2018	September 21, 2018
Deadline to make rebuttal expert disclosures	August 20, 2018	October 19, 2018
Deadline to file dispositive motions	October 18, 2018	December 21, 2018
Deadline to file joint pretrial order	November 19, 2018	January 18, 2019

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1 Based on the foregoing stipulation and good cause appearing, the Parties respectfully request
2 that the Court enter an Order adopting the Parties' proposed schedule for completing all remaining
3 discovery and deadlines.

4 **IT IS SO STIPULATED.**

5 DATED this 17th day of July, 2018.

6 GREENBERG TRAURIG, LLP

7 /s/ Jacob D. Bundick

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10 *Counsel for Plaintiff*
11 *FocalPoint International, Inc.*

5 DATED this 17th day of July, 2018.

6 LEWIS ROCA ROTHGERBER CHRISTIE LLP

7 /s/ Dan R. Waite

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10 *Counsel for Defendants Dom Rubino Consulting*
11 *Services, Inc. and BizStratPlan, Inc.*

12 **IT IS SO ORDERED** this 23rd day of July, 2018.

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19 UNITED STATES DISTRICT JUDGE /
20 UNITED STATES MAGISTRATE JUDGE

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